

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

**KRISTINA RAPUANO, VASSIKI
CHAUHAN, SASHA BRIETZKE,
ANNEMARIE BROWN, ANDREA
COURTNEY, MARISSA EVANS, JANE
DOE, JANE DOE 2, and JANE DOE 3,**

*Plaintiffs, on behalf of themselves and all
others similarly situated,*

v.

TRUSTEES OF DARTMOUTH COLLEGE,

Defendant.

CASE No. 1:18-cv-01070 (LM)

**PARTIES' JOINT SUBMISSION OF PROPOSED CLASS ACTION SETTLEMENT
AND PROPOSED SCHEDULE FOR BRIEFING IN SUPPORT THEROF**

Pursuant to the Parties' Joint Report Following Mediation and Joint Motion to Extend Stay to Allow Submission of Settlement Documents (the "Joint Mediation Report," ECF No. 42), the Court's order granting same, as well as Fed. R. Civ. P. 23(e) and Local Rule 23.1(b), the Parties make this joint submission in connection with their proposed settlement of this matter.

Attached as Exhibit 1 hereto is the parties' proposed Class Action Settlement, which the Parties are submitting for consideration by the Court.

As set forth in the Joint Mediation Report, the Parties also wish to propose and jointly move that the Court allow them to follow an agreed-upon process and schedule for the filing of documents relating to the proposed Class Action Settlement. In that regard, the Parties request that the Court adopt the following process and schedule:

1. Plaintiffs' Motion for Preliminary Approval of Proposed Class Action Settlement and any accompanying documents will be filed on September 25, 2019.
2. The Parties respectfully request that a preliminary hearing, if deemed necessary by

the Court, be scheduled for October 17, 2019 or October 18, 2019.

3. Plaintiffs' Motion for Final Approval and any accompanying documents will be filed thirty (30) days before the final approval hearing.

4. Plaintiffs' Motion for Attorneys' Fees, Costs, and Service Awards will be filed thirty (30) days before the final approval hearing.

The Parties further request that the stay of other deadlines in this litigation, which is currently in effect, remain in effect until further order of this Court.

WHEREFORE, the Parties respectfully request that the Court allow and adopt the schedule they have proposed herein, order that submissions in connection with the proposed Class Action Settlement be made as set forth above, and order that the stay of deadlines in this matter will remain in effect until further order of this Court.

Respectfully Submitted,

Dated: September 10, 2019

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